

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

KERRICK PANE BERRIOS, *on behalf of
himself and others similarly situated in the
proposed FLSA Collective Action,*

Plaintiff,

- against -

ARROW SECURITY INC., ARROW
SECURITY OF NEW YORK., and
ALEXANDER CARO,

Defendants.

Case No.: 23-cv-04646 (BMC)

OFFER OF JUDGMENT
MADE PURSUANT TO
RULE 68 OF THE FEDERAL
RULES OF CIVIL PROCEDURE

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants ARROW SECURITY INC., ARROW SECURITY OF NEW YORK., and ALEXANDER CARO, (“Defendants”), offer to allow Plaintiff KERRICK PANE BERRIOS (“Plaintiff”) to enter judgment against them, jointly and severally, in the amount of Four Thousand Dollars and Zero Cents (\$4,000.00), inclusive of attorneys’ fees and costs. This shall be the total amount to be paid by Defendants ARROW SECURITY INC., ARROW SECURITY OF NEW YORK., and ALEXANDER CARO, on account of any liability claimed in this action, including all costs of suit and attorneys’ fees otherwise recoverable in this action by Plaintiff.

This offer is made pursuant to Rule 68 of the Federal Rules of Civil Procedure and evidence of this offer is not admissible.

This offer is not to be construed as an admission that Defendants are liable in this action or that Plaintiff has suffered any damages. Additionally, both parties waive any right to pursue any further costs or claims, including, but not limited to, attorney's fees relating to Plaintiff's claims.

To accept this offer, Plaintiff must serve written notice of acceptance thereof within fourteen (14) days of the date this offer is made. Written notice of acceptance must be made in writing to Christopher K. Collotta, Esq. and/or Saul D. Zabell, Esq. as attorneys for Defendants, Zabell & Collotta, P.C., 1 Corporate Dr., Suite 103, Bohemia, NY 11716. If this offer is not accepted in writing within fourteen (14) days after it is served, it will be deemed withdrawn.

Dated: Bohemia, New York
August 16, 2023

ZABELL & COLLOTTA, P.C.
Attorneys for Defendants
Arrow Security Inc., Arrow
Security of New York, Inc., and
Alexander Caro,

By: 

Christopher K. Collotta, Esq.
Saul D. Zabell, Esq.
One Corporate Drive, Suite 103
Bohemia, New York 11716
Tel. (631) 589-7242
Fax. (631) 563-7475
ccollotta@laborlawsny.com
szabell@laborlawsny.com